

REMARKS

Applicants respectfully request further examination and reconsideration in view of the above amendments and arguments set forth fully below. Claims 1-32 were previously pending in the instant application. Within the Office Action, Claims 1-4, 6, 7, 20, 21 and 25-32 have been rejected. By way of the above amendments, Claims 1, 12-14, 16, 17, 20, 26, 28 and 31 have been amended and Claim 33 has been added. Accordingly, Claims 1-33 are now pending in this application.

Election/Restriction Requirements:

Claims 1-30 have been previously subjected to an election/restriction requirement. In response to the election/restriction requirement, Applicants withdrew Claims 5, 8-11, 15, 18 and 22-24 and stated that the remaining Claim reads on the elected species. Within the Office Action, it is stated that Claims 12-14, 16, 17 and 19 are being withdrawn for Claiming squeegee **walls**, which are not disclosed in the elected Figs. 1B and 5A. Applicants respectfully disagree. A squeegee structure by definition has squeegee walls (at least two walls) that protrude to form a squeegee edge. In view of the amendments provided to clarify the term walls in the Claims 12-14, 16, 17 and 19, Applicants respectfully request that Claims 12-14, 16, 17 and 19 be reentered into the prosecution of the present application.

Objection to Specification:

The Specification has been objected to for a number of minor typographical errors. By way of the above amendment, these typographical errors have been corrected.

Objection to Claims:

Within the Office Action Claims 1, 29 and 31 have been objected to for a number of informalities. Claims 1, 29 and 31 have been amended to correct these informalities.

Rejections Under 35 U.S.C. § 102

Within the Office Action, Claim 20 has been rejected under 35 U.S.C. § 102(b) as being anticipated by document No. GB 2,319,170 to Chi Hung Chan (hereafter "Chan"). The rejection of Claim 20 under 35 U.S.C. § 102(b) as being anticipated by Chan is moot in view of the above amendments. Specifically, Claim 20 has been amended to recite a cleaning device comprising a

first section configured to rotate or oscillate and a second section surrounding the first section configured to rotate or oscillate at a rate or direction that is different from that of the first section, wherein the first and the second sections comprise bristles. These features are neither taught nor suggested by the teachings of Chan. For at least these reasons, the independent Claim 20 is allowable over the teachings of Chan.

Within the Office Action, Claims 1, 4, 6, 31 and 32 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Document No. 2004/0154112 to Braun (hereafter “Braun”). Applicants respectfully traverse the rejection of Claims 1, 4, 6, 31 and 32 under 35 U.S.C. § 102(e) as being anticipated Braun.

Braun does not qualify as prior art. Attention is respectfully drawn to the Provisional Application No. 60/330,317, filed January 10, 2003, from which the present Application claim priority. A copy of the Provisional Application No. 60/330,317, filed January 10, 2003, is attached hereto as Appendix A. Applicants contend that there is clear support for the claimed invention in the Provisional Application No. 60/330,317. Accordingly, Applicants respectfully request the rejection of Claims 1, 4, 6, 31 and 32 under 35 U.S.C. § 102(e) as being anticipated by Braun be withdrawn.

Within the Office Action, Claim 25 has been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 2,144,408 to Holmes (hereafter “Holmes”). The rejection of Claim 25 under 35 U.S.C. § 102(b) as being anticipated Holmes is considered moot in view of the above amendments.

Specifically, the independent Claim 25 is directed to a device comprising a cleaning head, the cleaning head comprising a first region with a first squeegee element and bristles configured to treat a working surface, a second region with bristles configured simultaneously treat the working surface and means to couple the cleaning head to a motorized handle that automatically moves the first region. Holmes does not teach or suggest a first region with both bristles and a squeegee, a second section with bristles and a motorized handle configured to automatically move the first region. For at least these reasons, the independent Claim 25 is allowable over the teachings of Holmes.

Rejections Under 35 U.S.C. § 103

Within the Office Action, Claim 21 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Chan in view of document No. GB 2,371,217 to McDougall (hereafter “McDougall”).

5 Claim 21 is dependent on the independent Claim 20. As described above, the independent Claim 20 is allowable over the teachings of Chan. Accordingly, Claim 21 is also allowable as being dependent on an allowable base claim.

10 Within the Office Action, Claims 1-4, 7 and 26-30 have been rejected under 35 U.S.C. § 102(3) as being unpatentable over U.S. Publication No. 2003/0182746 to Fattori (hereafter “Fattori”) view of McDougall.

15 Specifically it is stated within the Office Action that Fattori teaches independently movable regions. Further, Fattori states that “the term ‘bristles’ is used in the generic sense as cleaning elements or massage elements and could include, for example, elastomeric finger or walls arranged a circular cross-section shape or any type of desired shape, including straight portions or sinusoidal portions.” [Fattori, ¶ 0016] It is further stated within the Office Action that even if Fattori does not teach squeegee elements, McDougall does and, therefore, it would have been obvious to one of ordinary skill in the art to modify the device of Fattori to include squeegees on one or more of the independently movable regions.

20 Fattori does not teach squeegee wiping elements that include elongated wiping edges. While Fattori appears to teach elastomeric fingers with different geometries, Fattori does not teach or suggest the **combination** of “conventional bristles” and elastomeric wiping elements.

25 McDougall teaches curved elastomeric wiping elements in combination with bristles on a movable region of an electric toothbrush. McDougall does not teach or suggest two or more independently moveable regions, such as currently claimed. Accordingly, Applicants contend that neither Fattori nor McDougall, alone or in combination, teaches or suggests independently movable regions wherein one or more of the movable regions comprise a squeegee with elongated walls that protrude to form an elongated wiping edge, such as recited in the independent Claims 1 and 26. Nor do Fattori or McDougall, alone or in combination, teach or
30 suggest a squeegee element comprising a continuous wiping edge, such as recited in the independent Claim 28. For at least these reasons the independent Claims 1, 26 and 28 are allowable over the teaching of Fattori, McDougall and their combination.

Claims 2-4 and 7 depend from the independent Claim 1; Claim 27 depends from the independent Claim 26; and Claims 29 and 30 depend from the independent Claim 28. As stated above, Claims 1, 26 and 28 are allowable over the teaching of Fattori, McDougall and their combination. Accordingly, Claims 2-4, 7, 27, 29 and 30 are also all allowable as depending from allowable base claims.

For the reasons given above, Applicants respectfully submit that Claims 1-4, 6, 7, 12-14, 16, 17, 19-21 and 25-33 are now in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, the Examiner is encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,
HAVERSTOCK & OWENS LLP

Dated: _____

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By: _____

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